



DEPARTMENT OF HEALTH & HUMAN SERVICES

SEP 21 1999

Food and Drug Administration
Rockville MD 20857

Samia N. Rodriguez
Hyman, Phelps & McNamara, P.C.
700 Thirteenth Street N.W., Suite 1200
Washington, D.C. 20005-5929

Re: Docket No. 80N-0042
Comments No. CP7 and SUP11

Dear Ms. Rodriguez:

This is in response to your submission of the final report of an intra-oral test in humans dated April 22, 1999 (coded SUP11 under docket number 80N-0042 in FDA's Dockets Management Branch). The results of this study were submitted in lieu of the animal caries reduction test required by the anticaries final monograph to demonstrate the bioavailability of the fluoride ion in Amway Corporation's (Amway) Glister Fluoride Toothpaste. In a citizen petition (coded CP7) submitted on behalf of Amway on October 8, 1997, you requested that the results of an alternative procedure be accepted as compliance with the biological testing requirements of the final monograph for over-the-counter (OTC) anticaries drug products (21 CFR § 355.70).

The randomized, double-blind, placebo-controlled cross-over study, conducted at the Indiana University Oral Health Research Institute, compared the effect of the test product on the fluoride uptake and mineral content of incipient enamel lesions to an 1,100 ppm fluoridated positive control dentifrice, a 250 ppm fluoridated dentifrice, and a placebo.

The agency has reviewed the final study report and has the following comments:

1. On page 7 of the Final Report included in the April 21, 1999 submission, item number 2 refers to a formula that is not explained. Specifically, to calculate delta Z, why is the lesion depth multiplied by 87, and where is an explanation for the "curve which relates the volume percent mineral at distances from the specimen surface with respect to section thickness," as described in that formula? Is a description of the curve available in the literature?
2. On page 12 of the report, Tables A and B summarize the mineral content changes between test groups. However, no p-values are reported. Please submit a complete statistical analysis, including the p-values for each of the comparisons in

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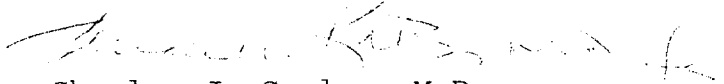
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each table (i.e., positive control compared to test group, positive control compared to placebo, and test group compared to placebo).

The above information should be submitted in three copies, identified with the docket and comment numbers that appear at the beginning of this letter, to the Dockets Management Branch (HFA-305), Food and Drug Administration, Room 1-23, 12420 Parklawn Drive, Rockville, Maryland 20857.

I hope this information is helpful.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Charles J. Ganley", is written over the typed name.

Charles J. Ganley, M.D.

Director

Division of OTC Drug Products

Office of Drug Evaluation V

Center for Drug Evaluation and Research

M E M O R A N D U M

DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH SERVICE
FOOD AND DRUG ADMINISTRATION
CENTER FOR DRUG EVALUATION AND RESEARCH

DATE: SEP 22 1999

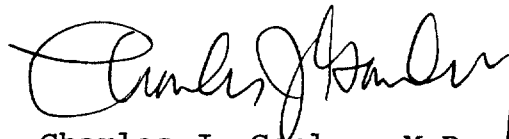
FROM: Director
Division of OTC Drug Products, HFD-560

SUBJECT: Material for Docket No. 800-0042

TO: Dockets Management Branch, HFA-305

☐ The attached material should be placed on public display under the above referenced Docket No.

☒ This material should be cross-referenced to Comment No. CP7/SUP II


Charles J. Ganley, M.D.

Attachment